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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE WESTERN DISTRICT OF WASHINGTON**

10 JONAS SYLVESTER,

11 Plaintiff,

12 vs.

13 STOLTZ MANAGEMENT OF
14 DELAWARE, d/b/a STOLTZ REAL
15 ESTATE PARTNERS, KEITH STOLTZ,
16 and KYLE STOLTZ

17 Defendants.

No. 2:23-cv-00405

JLR

STIPULATED MOTION AND
[PROPOSED] ORDER FOR
EXTENSION OF INITIAL
DISCLOSURES PURSUANT TO FRCP
26(a)(1)

NOTE FOR MOTION CALENDAR:
June 22, 2023

18 **STIPULATION**

19 COME NOW THE PARTIES HERETO, through their respective counsel and
20 stipulate and agree that the deadline for exchanging initial disclosures be postponed to
21 September 19, 2023, which is seven days after the currently scheduled mediation date. The
22 parties strongly believe that the prospects for a negotiated settlement will be substantially
23 increased if they do not expend resources on litigation activities prior to the mediation. All
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1 other discovery shall be complete in compliance with the Order Setting Trial Date and Related
2 Dates.

3 The foregoing is stipulated and agreed to.

4 DATED this 22nd day of June 2023.

5 FRANK FREED SUBIT & THOMAS LLP

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6 By: /s/ Michael C. Subit

By: /s/ Kristy S. Ball

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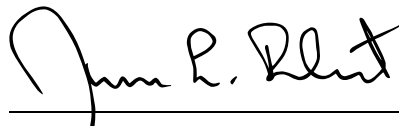
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13 *Attorneys for Defendants*

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15 **ORDER**

16 Based upon the above stipulation and agreement by the parties, the Court hereby
17 ORDERS that the Initial Disclosure deadline be postponed until September 19, 2023. All other
18 discovery shall be complete in compliance with the Order Setting Trial Date and Related
19 Dates.

20 PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

21
22 DATED this 22nd day of June, 2023.

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25 JAMES L. ROBART

UNITED STATES DISTRICT COURT JUDGE